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November 16, 2018

VIA ECF AND ELECTRONIC MAIL

Hon. Valerie E. Caproni, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007
Email: CaproniNYSDChambers@nysd.uscourts.gov

Re: *Snitzer et al. v. The Board of Trustees of the American Federation
of Musicians and Employers' Pension Fund, et al.*,
Case No. 1:17-cv-05361-VEC

Dear Judge Caproni:

We are counsel for the Plaintiffs in the above-referenced action and write, jointly with Defendants' counsel, to provide the Court with the parties' seventh bi-monthly update on the status of discovery in the case, as required by the Court's September 18, 2017 Order (Dkt No. 39).

We are pleased to report that fact discovery between the parties is progressing consistent with the Amended Scheduling Order entered by the Court on October 10, 2018. There are currently no discovery disputes between the parties that require resolution by the Court.

Defendants have completed the depositions of the Plaintiffs and Plaintiffs have deposed five defendant trustees and the Plan's Executive Director. Depositions of additional defendant Trustees and former Plan counsel are scheduled in New York and Los Angeles. Plaintiffs have also received document productions from several non-parties, issued subpoenas to certain other non-parties, and are in the process of scheduling depositions of some of the non-parties.

We thank the Court for its attention to this matter.

Respectfully submitted,



Steven A. Schwartz

SAS/sas

cc: All counsel of record (by ECF and Email)